

FISHER & PHILLIPS LLP
3993 Howard Hughes Parkway, Suite 650
Las Vegas, Nevada 89169

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF TEAMSTERS
LOCAL 631 SECURITY FUND
FOR SOUTHERN NEVADA,
Plaintiff,

vs.

NATIONAL CONVENTION
SERVICES, INC., a revoked New
York corporation; JOSEPH A.
SANTAMORENA, an individual
doing business as NATIONAL
CONVENTION SERVICE; and
WESTERN SURETY
COMPANY,

Defendants.

CASE NO.: 2:07-cv-01348-LRH-LRL

**STIPULATION, REQUEST AND
PROPOSED ORDER FOR
EXTENSION OF TIME TO FILE
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S APPLICATION FOR
DEFAULT JUDGMENT**

(Third Request)

Plaintiff Trustees of Teamsters Local 631 Security Fund for Southern Nevada ("Plaintiff"), and Defendant National Convention Services, Inc., ("Defendant") (collectively "the Parties"), by and through their respective counsel, hereby respectfully submit this Stipulation, Request and Proposed Order for Extension of Time to File Defendant's Opposition to Plaintiff's Application for Default Judgment. This Stipulation is made in accordance with LR 6-1, LR 62, AND lr 7-1 of the Local Rules of Court.

FISHER & PHILLIPS LLP
3993 Howard Hughes Parkway, Suite 650
Las Vegas, Nevada 89169

1 On October 3, 2008, Defendant filed its Motion for Extension of Time to File
2 Opposition to Plaintiff's Application for Default Judgment and [Proposed] Order
3 Thereon ("Motion"). The Order granting Defendant's Motion was signed on October
4 7, 2008, granting Defendant until October 23, 2008, within which to oppose the
5 Motion.

6 On October 24, 2008, the above-referenced court, by The Honorable Larry R.
7 Hicks, entered an Order granting the Parties' Stipulation, Request and Proposed Order
8 for Extension of Time to File Defendant's Opposition to Plaintiff's Application for
9 Default Judgment (Second Request), permitting Defendant up to and including
10 November 13, 2008, within which to file its response. Said Order was filed on October
11 27, 2008.

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Upon agreement of the Parties, it is respectfully requested that this Court grant
 2 Defendant an additional eleven (11) days to file its response to the Motion, up to and
 3 including November 24, 2008. This third request for an extension is requested as the
 4 parties have agreed to a settlement and require this requested extension to facilitate
 5 finalizing the settlement details.

6 Dated this 13th day of November, 2008

Dated this 13th day of November, 2008

7 BROWNSTEIN HYATT FARBER
 8 SCHRECK, LLP

FISHER & PHILLIPS LLP

9
 10
 11 /s/ Michael Infuso

12 Michael Infuso, Esq.
 13 100 City Parkway, Ste. 1600
 14 Las Vegas, NV 89106
 15 *Attorney for Plaintiff*

/s/ Jeffrey D. Winchester

16 Mark J. Ricciardi, Esq.
 17 Jeffrey D. Winchester, Esq.
 18 Howard Hughes Parkway, Suite 650
 19 Las Vegas, NV 89169
 20 *Attorney for Defendant*

ORDER

21 IT IS SO ORDERED:

22 Defendant National Convention Services, Inc.'s ("National") is granted an
 23 extension of time up to and including November 24, 2008, within which to file its
 24 Opposition to Plaintiff's Application for Default Judgment.

25 DATED: November 14, 2008



26 LARRY R. HICKS
 27 UNITED STATES DISTRICT JUDGE
 28